REMARKS

Pursuant to the office action mailed October 21, 2004, the specification was objected to as containing an informality. Claims 1 and 12 were rejected under 35 U.S.C. 102(b) given Takahashi et al. (U.S. Patent No. 6,078,694) ("Takahashi"). Claims 1-9 and 12 were rejected under 35 U.S.C. 102(e) given Kimoto (U.S. Patent No. 6,665,340) ("Kimoto"). Claims 10-11 and 13-18 were rejected under 35 U.S.C. 103(a) given Kimoto in view of Ito et al. (U.S. Patent No. 6,377,309) ("Ito"). Claims 19-25 were allowed and the applicant thanks the Examiner for this finding. The applicant respectfully traverses these rejections and requests reconsideration.

The specification was objected to as containing an informality. In particular, the Examiner questions whether Table 2 is incomplete. The applicant has reviewed Table 2 and finds that it is, in fact, complete, and contains all entries and data intended by the applicant. If the Examiner has a specific concern with respect to Table 2, the applicant invites the Examiner to express that concern with greater particularly and the applicant will provide a corresponding more particular response. In the meantime, again, the applicant avers and confirms that Table 2 is complete.

Independent claims 1 and 12 have both been rejected as being anticipated by either of Takahashi and Kimoto. The applicant notes, however, that both Takahashi and Kimoto provide approaches that rely, totally and exclusively, upon serial/seriatim processing in order to determine padding values. More particularly, neither reference provides any teaching, suggestion, or inherent capability of achieving new padding values for a plurality of pixels in parallel; i.e., substantially simultaneously with one another.

In contrast, the applicant provides for the *substantially simultaneous* determination of new padding pixel values for a plurality of non-object pixels. Such an approach, of course is essentially opposite the approach taken by Takahashi and Kimoto.

The claims reflect and incorporate this difference. In particular, claim 1 provides, in relevant part:

> [F]or a plurality of non-object pixels within the grouping, determining, substantially simultaneously, a new padding pixel value as a function of at least a neighboring pixel value.

Similarly, claim 12 provides in relevant part:

> - selecting a macro block comprising a grouping of the state pixels and non-state pixels;
>
> - for each of the non-state pixels, determining, substantially simultaneously, whether to assign a new padding pixel value to the non-state pixel.

As neither Takahashi or Kimoto teaches or suggests such an approach, the applicant respectfully submits that neither reference can be said to anticipate the recitations of either independent claim 1 or 12. The applicant therefore respectfully submits that claims 1 and 12 are allowable over the references of record and may be passed to allowance.

The remaining rejected claims are ultimately dependent upon either claim 1 or claim 12, which claims have been shown allowable above. In addition, these claims set forth additional subject matter which, particularly when considered in context with the claims from which they depend, constitutes additional incremental patentable content. As the applicant believes that the discussion above is dispositive with respect to allowability, for the sake of brevity further details regarding allowability will not be set forth here.

For all the reasons set forth above, the applicant respectfully submits that claims 1 through 25 may be passed to allowance.

Respectfully submitted,

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